

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re	:	Chapter 11
	:	
TERRAFORM LABS PTE. LTD.,	:	Case No. 24–10070 (BLS)
	:	
Debtor.¹	:	Re: Docket No. ____
	:	
	X	

**ORDER GRANTING MOTION OF DEBTOR FOR LEAVE TO
FILE DEBTOR’S REPLIES IN SUPPORT OF (I) APPLICATION
TO RETAIN DENTONS US LLP AS SPECIAL COUNSEL AND
(II) MOTION TO PAY CERTAIN AMOUNTS IN FURTHERANCE OF LITIGATION**

Upon the motion (the “**Motion for Leave**”)² of Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), for entry of an order (this “**Order**”), pursuant to Local Rule 9006-1(d), granting the Debtor leave to file its Reply Papers in support of the Application and Motion, all as more fully set forth in the Motion for Leave; and the Court having jurisdiction to consider the Motion for Leave and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and §1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion for Leave and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Motion for Leave; and upon any hearing held on the Motion for Leave; and all objections, if any, to the relief requested in the Motion for Leave having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual

¹ The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion for Leave.

bases set forth in the Motion for Leave establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Motion for Leave is granted to the extent set forth herein.
2. The Debtor is granted leave and permission to file and serve the Reply Papers, and the Court will consider the Reply Papers at the hearing on March 5, 2024 at 2:30 p.m. (prevailing Eastern Time).
3. The Debtor is authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.
4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.